

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO: 23-_____
v.	:	DATE FILED: _____
MICHAEL VOGEL	:	VIOLATIONS:
	:	18 U.S.C. § 2251(a) (manufacture of child
	:	pornography – 2 counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 22, 2015, in Montgomery County, in the Eastern District of Pennsylvania, defendant

MICHAEL VOGEL

employed, used, persuaded, induced, enticed and coerced Minor #1, who had not attained the age of 18 years and who is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and the visual depiction was produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2015, in Montgomery County, in the Eastern District of Pennsylvania, defendant

MICHAEL VOGEL

employed, used, persuaded, induced, enticed and coerced Minor #1, who had not attained the age of 18 years and who is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and the visual depiction was produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2251(a) as set forth in this indictment, defendant

MICHAEL VOGEL

shall forfeit to the United States of America:

- (a) any matter which contains any child pornography;
- (b) any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly from such violations,; and
- (c) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 2428 and 2253, to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 2428 and 2253.

A TRUE BILL:

GRAND JURY FOREPERSON

A handwritten signature in blue ink, appearing to read 'JCR / for', is positioned above a horizontal line.

JACQUELINE C. ROMERO
United States Attorney